

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

B.D. COOKE & PARTNERS LIMITED, AS
ASSIGNEE OF CITIZENS CASUALTY COMPANY
OF NEW YORK (IN LIQUIDATION),

Plaintiff,

-against-

CERTAIN UNDERWRITERS AT LLOYD'S,
LONDON,

Defendants.

Civil Action No. 08-CIV-3435 (RJH)

ELECTRONICALLY FILED

**NOTICE OF MOTION OF B.D.
COOKE TO REMAND ON
GROUNDS OF LACK OF
SUBJECT MATTER
JURISDICTION**

PLEASE TAKE NOTICE that, upon the annexed memorandum of law and affidavits submitted herewith, plaintiff B.D. Cooke, by its attorneys, Chadbourne & Parke LLP, will move this Court before the Honorable Richard J. Holwell, at the United States Court House, 500 Pearl Street, Courtroom 17B, New York, New York, on a date to be determined by the Court, for an order pursuant to 28 U.S.C. § 1447(c) remanding this action to the Supreme Court of New York, County of New York, from which it was improperly removed on or about April 7, 2008, pursuant to the defendants' Notice of Removal.

PLEASE TAKE FURTHER NOTICE that, pursuant to 28 U.S.C. § 1447(c), at the same time and place, plaintiff will move that costs, including attorney's fees, be taxed in accordance with the law.

Dated: New York, New York
May 9, 2008

CHADBOURNE & PARKE LLP

By 

John F. Finnegan (JFF-3336)
Attorneys for Plaintiff
30 Rockefeller Plaza
New York, New York 10112
(212) 408-5100

Carey G. Child
Anne Linder
LeeAnn O'Neill
CHADBOURNE & PARKE LLP
1200 New Hampshire Avenue, N.W.
Washington, D.C. 20036

Of Counsel